

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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TZIPORA SARAH KARIN EISINGER, PhD,

Plaintiff,

v.

THE TRUSTEES OF THE UNIVERSITY  
OF PENNSYLVANIA,

Defendant.

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CIVIL ACTION NO.: 2:24-cv-00397

The Honorable Jeffrey L. Schmehl

**MOTION FOR ADMISSION *PRO HAC VICE*  
OF DIONNA F. SHEAR**

Pursuant to Local Rule of Civil Procedure 83.5.2(b) for the United States District Court, Eastern District of Pennsylvania and Section I(E) of the Policies and Procedures of the Honorable Jeffrey L. Schmehl, Jeffrey A. Sturgeon, the undersigned counsel for Defendant The Trustees of the University of Pennsylvania (“Defendant”), respectfully moves this Court for the admission *pro hac vice* of Dionna F. Shear, Esq. on behalf of Defendant, and in support thereof states the following:

1. I, Jeffrey A. Sturgeon, am admitted to practice before the Commonwealth of Pennsylvania and the Eastern District of Pennsylvania and am a partner at the law firm of Baker & McKenzie LLP, 452 Fifth Avenue, New York, NY 10018.

2. I am a member in good standing of the bars of the Commonwealth of Pennsylvania and the Eastern District of Pennsylvania and serve as Lead Counsel to represent Defendant in this action and have entered my appearance as counsel of record for Defendant in this matter.

3. I have represented Defendant for over 15 years.

4. Dionna F. Shear is a senior associate at Baker & McKenzie LLP, 452 Fifth Avenue,

New York, NY 10018, and has been working with me on this matter since Plaintiff filed her underlying complaint with the PHRC in August 2022.

5. Ms. Shear is admitted to the jurisdictions indicated in the attached affidavit. *See* Exhibit A.

6. Ms. Shear is active and in good standing in all jurisdictions to which she is admitted.

7. Ms. Shear has never been suspended from the practice of law in any jurisdiction or received any public reprimand by the highest disciplinary authority of any bar in which she has been a member.

8. Defendant desires to have Ms. Shear represent them as co-counsel of record in this matter because she is familiar with the facts of this action and her admission to practice *pro hac vice* in this matter would allow for the case to progress in an efficient manner.

9. The filing fee has been paid.

Dated: May 10, 2024

Respectfully submitted,

/s/ Jeffrey A. Sturgeon

Jeffrey A. Sturgeon (PA ID No. 93750)  
**BAKER & MCKENZIE LLP**

1650 Market Street  
Suite 3600  
Philadelphia, PA 19103

452 Fifth Avenue  
New York, NY 10018  
Tel: 212.626.4339  
Fax: 212.310.1870  
Email: [jeffrey.sturgeon@bakermckenzie.com](mailto:jeffrey.sturgeon@bakermckenzie.com)

Attorneys for Defendant,  
The Trustees of the University of Pennsylvania

**CERTIFICATE OF SERVICE**

I, Jeffrey A. Sturgeon, hereby certify that a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* of Dionna F. Shear and all documents in support thereof, were filed electronically and are available for viewing and downloading from the ECF system of the U.S. District Court for the Eastern District of Pennsylvania, and that I served the same via electronic filing on May 10, 2024 upon the following:

Katherine C. Oeltjen  
Console Mattiacci Law, LLC  
1525 Locust Street, 9<sup>th</sup> Fl.  
Philadelphia, PA 19102  
oeltjen@consolelaw.com

Attorney for Plaintiff

/s/ Jeffrey A. Sturgeon  
Jeffrey A. Sturgeon